

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

XIANHUA ZHANG

Plaintiff,

v.

ING DIRECT

Defendant.

Case No. 07-555 (JJF)

**REPLY BRIEF IN SUPPORT OF DEFENDANT’S MOTION TO COMPEL PLAINTIFF
TO PROVIDE COMPLETE, NON-EVASIVE RESPONSES TO INTERROGATORIES 2,
3, 5, 16, 17, AND DOCUMENT REQUESTS 10, 11, 12, 17, 21, 22, AND 23**

Defendant ING Bank, fsb (“Defendant”) submits this Reply Brief in further support of its Motion to Compel. Since Defendant filed its Motion to Compel on June 3, 2008, Plaintiff has produced a handful of documents, primarily “screen shots” of his personal email inbox and a tax document that reveals the amount of unemployment compensation Plaintiff received subsequent to the termination of his employment with Defendant. Plaintiff also confirms in his response to Defendant’s Motion to Compel that he is limiting his damages claim to August 16, 2005 through November 28, 2005 because he obtained new employment on or about November 28, 2005. Plaintiff’s production and confirmation of the limited nature of his damages claim have eliminated several issues, but several issues remain, including Plaintiff’s refusal to provide documents responsive to Defendant’s document requests 10 and 17 as well as Plaintiff’s claim that “screen shots” of his email inbox satisfy his discovery obligations regarding Defendant’s document request 11. Moreover, Plaintiff refuses to respond fully to several interrogatories and

document requests that seek nothing more than relevant information that is required to litigate this case.

ARGUMENT

A. Defendant Will Withdraw Document Request 10 In Its Entirety And Document Request 17 As To Post 11/28/2005 Economic Damages If Plaintiff Has Indeed Confirmed He Seeks Economic Damages From Only 8/16/2005 Through 11/28/2005.

Defendant's document request 10 seeks all documents related to the income Plaintiff received on or after August 16, 2005, the day his employment with Defendant ended. Document request 17 seeks all documents related to any damages Plaintiff claims he has suffered as a result of the conduct of Defendant. In response to these requests, Plaintiff has produced only one document that indicates the amount of unemployment compensation he received between August 16, 2005 and November 28, 2005. Plaintiff claims that he has no obligation to produce any further documents related to his income or damages after November 28, 2005 (the date he obtained new employment with CDI Corporation) because "Plaintiff only claims wage loss between 8/16/2005 and 11/28/2005." See Pl's Opp. Br. at 2. Subject to Plaintiff's confirmation that *his only economic damages claim* is back pay damages from August 16, 2005 to November 28, 2005, Defendant will withdraw document request 10 in its entirety and document request 17 only as to post November 28, 2005 economic damages. Otherwise, Plaintiff continues to be in default of his discovery obligations under the Federal Rules of Civil Procedure.

B. Plaintiff's "Screen Shots" Do Not Satisfy His Obligations Regarding Document Request 11.

Defendant's document request 11 seeks documents related to Plaintiff's job search efforts after August 16, 2005 when he separated from Defendant. The only documents Plaintiff has

produced regarding this request are “screen shots” of his email inbox. See Exh. A. These documents do not provide any information regarding where Plaintiff looked for work, what kind of jobs he sought, if any, whether he participated in any interviews or was offered any positions. In sum, these documents do nothing to aid Defendant in determining whether Plaintiff satisfied his duty to mitigate his damages.

Plaintiff goes on to claim that he has no other documents related to this request because the emails he received from employers where he allegedly applied for work “are also deleted long time ago to free space.” See Pl’s Opp. at 1. Plaintiff does not explain, however, how he was able to take “screen shots” of these allegedly deleted emails but is unable to open the emails and print them out. Defendant is concerned that Plaintiff has deleted the actual evidence of his mitigation efforts sometime after he provided his initial discovery responses.

C. Plaintiff Continues to Refuse To Respond Fully To Several Other Interrogatories And Document Requests.

Despite the passage of several months, countless entreaties from Defense counsel and Defendant’s Motion to Compel, Plaintiff continues to refuse to respond fully to Defendant’s interrogatories 2 and 3 (concerning Plaintiff’s mitigation efforts) or to provide documents responsive to Defendant’s document requests 12, 21, and 22 (concerning Plaintiff’s mitigation efforts, the documents Plaintiff provided to any governmental agency regarding this case, and the documents Plaintiff took with him and or retained from Defendant after his employment with Defendant concluded). As stated in Defendant’s Motion to Compel, these interrogatories and document requests seek relevant information and/or information reasonably likely to lead to the discovery of admissible evidence.

For the above reasons, and the reasons more fully stated in Defendant's initial Motion to Compel, Defendant respectfully requests that the Court grant its Motion to Compel.

Dated: June 30, 2008

/s/ David P. Primack
David P. Primack (I.D. No. 4449)
DRINKER BIDDLE & REATH LLP
1100 N. Market Street, Suite 1000
Wilmington, DE 19801-1254
(302) 467-4220
Attorneys for Defendant ING Bank, fsb

OF COUNSEL:

David J. Woolf (admitted *pro hac vice*)
Edward N. Yost (admitted *pro hac vice*)
DRINKER BIDDLE & REATH LLP
One Logan Square
18th & Cherry Streets
Philadelphia, PA 19103
(215) 988-2700

CERTIFICATE OF SERVICE

I, David P. Primack, hereby certify that, on this date, I caused a true and correct copy of the foregoing document to be served on the plaintiff by electronic and first-class U.S. mail, postage prepaid, at the following address:

Xianhua Zhang
212 Yorktown Court
Malvern, PA 19355

Dated: June 30, 2008

/s/ David P. Primack
David P. Primack

EXHIBIT A

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

http://us.mg1.mail.yahoo.com/dclaunch?rand=3e1d0meshtld5 metlife.com/dental

File Edit View Favorites Tools Help

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To	Subject	Sent	Size
merle.shao@ingdirect.com	book	Thu, 8/25/05 2:23 PM	2KB
nseramone@ingdirect.com	some issues	Thu, 8/25/05 2:15 PM	2KB
stevek@designstrategy.c	Re: Oracle designer/architect contract position in New	Thu, 8/25/05 1:45 P	3KB
Tim Boerner	RE: Oracle DBA Opportunity	Wed, 8/24/05 1:26 P	19KB
Kerica1@aol.com	Re: Oracle DBA Opportunity	Wed, 8/24/05 1:06 P	8KB
Vikas	Re: Inquiry about Dice Job Number XKORACLEDBAPA	Tue, 8/23/05 8:42 AM	3KB
linus mcginty	Re: Urgent Openings for Oracle DBAs in PA	Tue, 8/23/05 8:30 AM	94KB
linus mcginty	RE: Oracle DBA position available	Mon, 8/22/05 3:59 P	45KB
Peter DiNicola	Re: Oracle DBA position available	Mon, 8/22/05 3:18 P	37KB
Ryan McHugh	Re: Your Job Circle Listing	Mon, 8/22/05 3:17 P	6KB
Tom Altunay	Re: Contact info	Mon, 8/22/05 3:16 P	90KB
Re: Contact info		Mon, 8/22/05 1:35 P	92KB
rkelby@kellythomas-net	Re: Job status	Mon, 8/22/05 12:59	4KB
nleonard@anexinet.com	RE: JobCircle Applicant - Sr. DBA	Sun, 8/21/05 3:53 PM	40KB
Pam Stockli	RE: Short term contract	Sun, 8/21/05 3:46 PM	92KB
nleonard@anexinet.com	RE: JobCircle Applicant - Sr. DBA	Wed, 8/17/05 3:12 P	35KB
nleonard@anexinet.com	RE: JobCircle Applicant - Sr. DBA	Wed, 8/17/05 3:11 P	34KB
nleonard@anexinet.com	RE: JobCircle Applicant - Sr. DBA	Wed, 8/17/05 2:29 PM	28KB

Re: Oracle DBA / PA
Peter Zhang <peterzhang9999@yahoo.com> View To: Aditya <Aditya@catamerica.com>
read.doc (65KB)

Compact Header Full Message View

Today: WED, 8/23 - WED, 8/24 No events THU, 8/25 CapitalOne FRI, 8/26 SAT, 8/27 No events

Done Internet 100% 7:50 PM Wednesday 8/23/2006

Address: S: Windows Explorer Document1 - Microsof...

(2037 unread) Yahoo! Mail, peterzhang9999 - Windows Internet Explorer

http://us.mg1.mail.yahoo.com/dclaunch?rand=3e1d0meshtld5 metlife.com/dental

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To	Subject	Sent	Size
Schmeiss, Richard	RE: Oracle DBA	Wed, 9/7/05 2:33 AM	5KB
Kay Gupta	Re: Ref:Oracle DBA Opening	Wed, 9/7/05 2:20 AM	5KB
Wurst, Jon	RE: please send resume... SAP America	Fri, 9/2/05 6:34 AM	12KB
Alex Kent	Re: Oracle DBA contract in DE	Mon, 8/29/05 6:21 PM	6KB
Marty Radnor	Re: Current openings for DBAs in NJ and NY	Mon, 8/29/05 6:19 P	8KB
Marty Radnor	Re: your resume	Mon, 8/29/05 6:17 P	89KB
Jagru Shah	Re: HoJobs submission for DE-2001, Oracle DBA	Mon, 8/29/05 6:07 PM	27KB
Monica Solys	Re: resume	Mon, 8/29/05 5:47 PM	90KB
nseramone@ingdirect.com	some issues	Mon, 8/29/05 3:58 PM	2KB
lisawellu@yahoo.com	Fwd: CONFIRMATION OF YOUR CLAIMS	Sun, 8/28/05 12:39	3KB
Michael Reynolds	Re:	Fri, 8/26/05 2:15 PM	11KB
Raghu	Re: Preinterview Agreement & Candidate Assessment	Fri, 8/26/05 12:16 PM	96KB
Raghu	Re: Urgent Req: Oracle DBA(H/P/LN and HT)	Fri, 8/26/05 9:40 AM	92KB
Michael Reynolds	Re: Rate Confirmation	Fri, 8/26/05 9:37 AM	112KB
Rebecca Dimmick	Re: FW: QuinTech following up	Fri, 8/26/05 8:36 AM	91KB
Michael Reynolds	Re: MBRA	Fri, 8/26/05 8:13 AM	108KB
merle.shao@ingdirect.com	book	Thu, 8/25/05 2:23 PM	2KB
nseramone@ingdirect.com	some issues	Thu, 8/25/05 2:15 PM	2KB

Re: Oracle DBA / PA
Peter Zhang <peterzhang9999@yahoo.com> View To: Aditya <Aditya@catamerica.com>
read.doc (65KB)

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http://us.mg1.mai.yahoo.com/dc/launch?rend=3e1d0me8hd5 metlife.com/dental

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To	Subject	Sent	Size
Dechuk, Michael	Re: Elenica Phone Interview - Oracle DBA	Tue, 9/27/05 3:26 PM	7KB
Adam Rosenberg	Re: Job Opportunity	Tue, 9/27/05 12:53 PM	10KB
Andrionis, Deborah (372)	RE: Oracle DBA Position/Robert Half International	Mon, 9/26/05 12:54	11KB
tonyle@ingdirect.com	Hi	Mon, 9/26/05 11:15 AM	1KB
Frank J. Santoro	RE: my earlier message & your resume on Monster...	Mon, 9/26/05 10:33 AM	11KB
Frank J. Santoro	Re: my earlier message & your resume on Monster...	Mon, 9/26/05 10:05	19KB
Lena Kogan	Re: Oracle DBA Need ASAP	Sat, 9/10/05 5:40 AM	5KB
mwoollen@haydentechne	Re: Need for Oracle DBA	Thu, 9/8/05 9:55 PM	4KB
Dawn West	Re: Our Oracle DBA position	Thu, 9/8/05 9:21 PM	25KB
Infusedstaffing	Re: DBA Position	Thu, 9/8/05 8:39 PM	2KB
Kyle Phipps	Re: EDS	Thu, 9/8/05 8:28 PM	8KB
Fred Maccabee	Re: Fred Maccabee Resource Search	Wed, 9/7/05 5:11 AM	7KB
Fred Bader	Re: position	Wed, 9/7/05 3:04 AM	3KB
Schmeiss, Richard	RE: Oracle DBA	Wed, 9/7/05 2:33 AM	5KB
Kay Gupta	Re: Ref:Oracle DBA Opening	Wed, 9/7/05 2:20 AM	5KB
Wurst, Jon	RE: please send resume... SAP America	Fri, 9/2/05 6:34 AM	12KB
Alex Kent	Re: Oracle DBA contract in DE	Mon, 8/29/05 6:21 PM	6KB
Marty Rednor	Re: Current openings for DBAs in NJ and NY	Mon, 8/29/05 6:19 P	8KB

Re: Oracle DBA / PA
Peter Zhang <peterzhang9999@yahoo.com> View To: Aditya <Aditya@catamerica.com>
res05.doc (66KB)

Hi,

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To	Subject	Sent	Size
Michael Amato	RE: Inquiry about Dice Job Number ODBA2	Thu, 10/6/05 2:42 PM	7KB
Mindy Mhojov	Re: Oracle DBA position	Thu, 10/6/05 2:23 PM	9KB
Michael Amato	RE: Inquiry about Dice Job Number ODBA2	Wed, 10/5/05 1:36 PM	67KB
todd@sunrisesys.com	Re: CONFIRMATION - Sunrise systems J&J - Oracle DBA in PA	Tue, 10/4/05 1:41 PM	25KB
Shamsheer	Re: Oracle DBA Needed Urgently	Tue, 10/4/05 1:35 PM	98KB
Dechuk, Michael	Re: Elenica Phone Interview - Oracle DBA	Tue, 10/4/05 1:27 PM	7KB
David.Shi@MBNA.COM	Thanks	Mon, 10/3/05 5:43 PM	3KB
Dechuk, Michael	Re: Elenica Phone Interview - Oracle DBA	Mon, 10/3/05 1:12 PM	6KB
Winter, Stephanie	RE: FW: Inquiry about Dice Job Number xyz45057503	Mon, 10/3/05 12:40	37KB
todd@sunrisesys.com	Re: CONFIRMATION - Sunrise systems J&J - Oracle DBA in PA	Fri, 9/30/05 12:30 PM	26KB
Adam Rosenberg	RE: Job Opportunity	Fri, 9/30/05 10:46 AM	36KB
Shruti.Modi@aig.com	DEA job	Thu, 9/29/05 6:03 PM	4KB
Winter, Stephanie	Re: FW: Inquiry about Dice Job Number xyz45057503	Thu, 9/29/05 5:18 PM	25KB
Adam Rosenberg	RE: Job Opportunity	Tue, 9/27/05 7:44 PM	20KB
Dechuk, Michael	Re: Elenica Phone Interview - Oracle DBA	Tue, 9/27/05 3:26 PM	7KB
Adam Rosenberg	Re: Job Opportunity	Tue, 9/27/05 12:53 PM	10KB
Andrionis, Deborah (372)	RE: Oracle DBA Position/Robert Half International	Mon, 9/26/05 12:54	11KB
tonyle@ingdirect.com	Hi	Mon, 9/26/05 11:15 AM	1KB

Re: Oracle DBA / PA
Peter Zhang <peterzhang9999@yahoo.com> View To: Aditya <Aditya@catamerica.com>
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To	Subject	Sent	Size
Dechrik, Michael	Re: Interview with Elenica CTO	Mon, 10/10/05 5:02 PM	4KB
Infotechstaffing	Re: DBA Position	Mon, 10/10/05 2:21	4KB
eliser@cuedata.com	RE: Could you contact me regarding Contract opportunity	Mon, 10/10/05 3:07 AM	109KB
Infotechstaffing	Re: DBA Position	Mon, 10/10/05 7:44 AM	7KB
eliser@cuedata.com	RE: Could you contact me regarding Contract opportunity	Sun, 10/9/05 3:53 PM	10KB
Rangana Rao	Re: FW: Opening in Whippany NJ	Sun, 10/9/05 3:52 PM	11KB
Infotechstaffing	Re: DBA Position	Sun, 10/9/05 3:52 PM	2KB
Anil Babu	Re: Opportunities with TBSS Inc.	Sat, 10/8/05 3:46 PM	105KB
Adam Rosenberg	Re: Interview	Fri, 10/7/05 3:10 PM	9KB
apply@rangam.com	Re: CareerBuilder.com: Oracle DBA	Fri, 10/7/05 3:06 PM	9KB
Mindy Mihajlov	RE: Oracle DBA position	Thu, 10/6/05 7:15 PM	14KB
ptaylor@Elenica.com	Thanks	Thu, 10/6/05 7:09 PM	3KB
fzheng@Elenica.com	Thanks	Thu, 10/6/05 4:08 PM	3KB
odvorikov@Elenica.com	Thanks	Thu, 10/6/05 4:03 PM	3KB
mdechrik@Elenica.com	Thanks	Thu, 10/6/05 3:59 PM	3KB
Michael Amato	RE: Inquiry about Dice Job Number 005A2	Thu, 10/6/05 2:42 PM	7KB
Mindy Mihajlov	Re: Oracle DBA position	Thu, 10/6/05 2:23 PM	9KB
Michael Amato	RE: Inquiry about Dice Job Number 005A2	Wed, 10/5/05 1:36 PM	5KB

Re: Oracle DBA / PA
Peter Zhang <peterzhang9999@yahoo.com> View To: Aditya <Aditya@catamerica.com>
res15.doc (65KB)

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To	Subject	Sent	Size
Norm Bauer	Re: WORD RESUME AND EXPLANATION	Fri, 10/14/05 2:10 PM	57KB
Vince	RE: Further to our discussion	Thu, 10/13/05 10:37	189KB
McClure, Phil (547)	Re: Re new Openings	Thu, 10/13/05 10:02	7KB
Amoroso, Jayson	RE: CareerBuilder Job Application	Tue, 10/11/05 5:22	69KB
Adam Rosenberg	RE: Interview	Tue, 10/11/05 2:01	17KB
cthrell@glotel.com	Re: 3 New positions in SE PA	Tue, 10/11/05 1:54	7KB
arjun@diverselynx.com	Re: Opportunity with Direct Client requirements [Corp]	Tue, 10/11/05 1:46	121KB
Ispeence-bowen@devonco	Re: Exciting long term Oracle opportunity!	Tue, 10/11/05 1:36	5KB
Zenex Jobs	Re: Permanent Senior DBA position [Fulltime position a	Tue, 10/11/05 1:27	5KB
eliser@cuedata.com	RE: Could you contact me regarding Contract opportun	Tue, 10/11/05 1:23	33KB
Amoroso, Jayson	RE: CareerBuilder Job Application	Tue, 10/11/05 12:54	150KB
ritesh@insystos.com	Re: 2 Hot Reks - 1) Oracle/ Apps DBA	Mon, 10/10/05 5:32	103KB
nabe.martin@nexans.com	Thanks	Mon, 10/10/05 5:22 PM	3KB
Infotechstaffing	Re: DBA Position	Mon, 10/10/05 5:17	6KB
Dechrik, Michael	Re: Interview with Elenica CTO	Mon, 10/10/05 5:02 PM	4KB
Infotechstaffing	Re: DBA Position	Mon, 10/10/05 2:21	4KB
eliser@cuedata.com	RE: Could you contact me regarding Contract opportunity	Mon, 10/10/05 8:07 AM	109KB
Infotechstaffing	Re: DBA Position	Mon, 10/10/05 7:44 AM	7KB

Re: Oracle DBA / PA
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res15.doc (65KB)

Hi,

TODAY: WED, 4/23 - WED, 5/14 No events THU, 5/15 - CapitalOne FRI, 5/16 - SAT, 5/21 No events

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http://us.mg1.mail.yahoo.com/dk/launch?rand=3e1d0mehsld5

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Spam (6) Empty
Trash (61) Empty
Contacts Add
Calendar
Notepad
All Feeds Add
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Home Sent 245 messages

Delete Reply Forward Move Print More Actions View

To	Subject	Sent	Size
Sandy	Re: Job Description	Wed, 10/19/05 10:28 A	9KB
KPrice@dsccorp.com	Re: Ken Price - Distributed Systems Services	Wed, 10/19/05 10:01 A	4KB
Dedrick, Michael	RE: Interview with Elenica CTO	Wed, 10/19/05 9:51 AM	6KB
Navin Guna	RE: Inquiry about Dice Job Number ODBAR	Wed, 10/19/05 9:30 AM	23KB
Emily Bleaser	Re: Brooksource	Tue, 10/18/05 4:38 PM	94KB
Josh Curry	Re: Oracle DBA opportunity	Tue, 10/18/05 2:28 PM	35KB
Winter, Stephanie	Re: Hi Peter!	Tue, 10/18/05 10:47 AM	46KB
Josh Curry	Re: Oracle DBA opportunity	Tue, 10/18/05 9:35	15KB
Carolyn Dougherty, CPC	Re: sungard news	Mon, 10/17/05 5:55 PM	3KB
Josh Curry	Re: Oracle DBA opportunity	Mon, 10/17/05 5:53	8KB
satyendu.nai@ress-gsg.com	Re: Urgent Opportunity for Oracle DBA Professional in PA.	Mon, 10/17/05 10:03 AM	90KB
Norm Bauer	Re: WORD RESUME AND EXPLANATION	Fri, 10/14/05 2:10 PM	97KB
Vince	RE: Further to our discussion	Thu, 10/13/05 10:37	189KB
McClure, Phil (547)	Re: Re new Openings	Thu, 10/13/05 10:02	7KB
Amaroso, Jayson	RE: CareerBuilder Job Application	Tue, 10/11/05 5:22	69KB
Adam Rosenberg	RE: Interview	Tue, 10/11/05 2:01	17KB
chirali@glotel.com	Re: 3 New positions in SE PA	Tue, 10/11/05 1:54	7KB
arjun@diverselynx.com	Re: Opportunity with Direct Client requirements [Corp]	Tue, 10/11/05 1:40	121KB

Re: Oracle DBA / PA
Peter Zhang <peterzhang9999@yahoo.com> View To: Aditya <aditya@catamerica.com>
res05.doc (65KB)

Hi,

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Address: S Windows Explorer jobApp.doc - Microso...

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http://us.mg1.mail.yahoo.com/dk/launch?rand=3e1d0mehsld5

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Sent
Spam (6) Empty
Trash (61) Empty
Contacts Add
Calendar
Notepad
All Feeds Add
My Folders Add

Home Sent 245 messages

Delete Reply Forward Move Print More Actions View

To	Subject	Sent	Size
nickdual@mbrixcc.com	Re: Contact Info for J&J Possible Opportunity	Thu, 10/20/05 5:32	7KB
Colleen Switala	Re: Opportunity with traffic.com	Thu, 10/20/05 5:17	91KB
Charles E. O'Kane	Re: Inquiry about Dice Job Number COK002	Thu, 10/20/05 5:16	23KB
Winter, Stephanie	RE: Hi Peter!	Thu, 10/20/05 5:14	24KB
Bush, Bill	RE: Oracle DBA Dream Team	Thu, 10/20/05 10:26 AM	38KB
koundinya@vjil.com	Re: Urgent need for Oracle DBA at Herndon,VA	Thu, 10/20/05 10:09 AM	4KB
Bush, Bill	RE: Oracle DBA Dream Team	Thu, 10/20/05 10:05 AM	124KB
Bill Bush	RE: Oracle DBA Dream Team	Thu, 10/20/05 9:35	33KB
koundinya@vjil.com	Re: Urgent need for Oracle DBA at Herndon,VA	Thu, 10/20/05 9:20	17KB
Flanagan, Lisa	Re: FV: Andesa position - Oracle DBA	Thu, 10/20/05 9:16	9KB
John Clark	Re: Thanks for taking my call	Wed, 10/19/05 12:12 PM	14KB
tmaj@astick@relevantz.com	Re: Dev Sys Engineer position	Wed, 10/19/05 11:35 A	120KB
Sandy	Re: Job Description	Wed, 10/19/05 11:30 A	3KB
KPrice@dsccorp.com	Re: Ken Price - Distributed Systems Services	Wed, 10/19/05 10:28 A	9KB
Dedrick, Michael	RE: Interview with Elenica CTO	Wed, 10/19/05 10:01 A	4KB
Navin Guna	RE: Inquiry about Dice Job Number ODBAR	Wed, 10/19/05 9:51 AM	6KB
Emily Bleaser	Re: Brooksource	Wed, 10/19/05 9:30 AM	23KB

Re: Oracle DBA / PA
Peter Zhang <peterzhang9999@yahoo.com> View To: Aditya <aditya@catamerica.com>
res05.doc (65KB)

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To	Subject	Sent	Size
Dacar, Julie I	Re: Job description	Wed, 10/26/05 8:58 AM	13KB
Alex Babitsky	RE: Request for Expert Directory	Tue, 10/25/05 3:20 PM	3KB
Kevin Brown	RE: Database Analyst	Tue, 10/25/05 1:41 PM	8KB
paulk@magna-systems.com	Re: REG: POSITION OPENING FOR ORACLE DBA IN PHILADELPHIA	Tue, 10/25/05 1:29 PM	24KB
Winter, Stephanie	RE: HI Peter! I have another Oracle DBA position for you	Tue, 10/25/05 1:25 PM	34KB
ambrish@cybercorp.com	RE: Inquiry about Dice Job Number DCORDBA	Tue, 10/25/05 9:04 AM	26KB
Deepak S R	Re: Excellent Opening - Oracle DBA	Mon, 10/24/05 5:46 PM	24KB
Kevin Brown	Re: Database Analyst	Mon, 10/24/05 2:46 PM	4KB
Tony.Bruno@itstaffinc.com	Re: #05-00256-Oracle 9i DBA: Performance Testing--	Mon, 10/24/05 2:40 PM	14KB
Mayne, Nancy	Re: DBA Position - Amtrak (Philadelphia, PA)	Mon, 10/24/05 1:47 PM	12KB
Petrada, Barbara	Re: Possible Opportunity with CIBER, Inc.	Mon, 10/24/05 1:25 PM	9KB
Balak, Kristine	RE: Opportunity in PA	Mon, 10/24/05 12:07 PM	9KB
Balak, Kristine	RE: Opportunity in PA	Mon, 10/24/05 11:54 AM	6KB
Balak, Kristine	RE: Opportunity in PA	Mon, 10/24/05 11:44 AM	3KB
Aditya	Re: Oracle DBA / PA	Fri, 10/21/05 10:27 AM	9KB
nichael@matixcc.com	Re: Contact Info for J&J Possible Opportunity	Fri, 10/21/05 9:30 AM	1KB
michael@matixcc.com	Re: Contact Info for J&J Possible Opportunity	Thu, 10/20/05 5:32 PM	7KB
Colleen Switala	Re: Opportunity with traffic.com	Thu, 10/20/05 5:17 PM	91KB

Re: Oracle DBA / PA
 Peter Zhang <peterzhang9999@yahoo.com> View To: Aditya <Aditya@matixcc.com>

Hi,

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To	Subject	Sent	Size
wwahl@infotechpa.com	RE: As per our telecom for Position in Harrisburg, PA - O	Fri, 10/28/05 10:40 AM	51KB
wwahl@infotechpa.com	RE: As per our telecom for Position in Harrisburg, PA - O	Fri, 10/28/05 9:17 AM	121KB
James Oliver	Re: Post For res	Fri, 10/28/05 9:03 AM	12KB
Dacar, Julie I	RE: references	Fri, 10/28/05 8:49 AM	12KB
Sam Matreja	Re: Database Administrator (DBA) - Senior - C. Jersey - 1 Yr Con	Thu, 10/27/05 12:01 PM	95KB
Dacar, Julie I	RE: job description	Wed, 10/26/05 2:47 PM	36KB
Joe Gold	RE: Peter, would these Oracle Apps DBA Assignment in PA inter	Wed, 10/26/05 2:12 PM	43KB
Dacar, Julie I	RE: job description	Wed, 10/26/05 11:39 AM	29KB
Dacar, Julie I	RE: job description	Wed, 10/26/05 11:08 AM	23KB
senb	RE: Inquiry about Dice Job Number ORADBA - client name Ferna	Wed, 10/26/05 9:04 AM	29KB
Timothy Matjasick	Re: DBA position	Wed, 10/26/05 9:03 AM	12KB
Dacar, Julie I	Re: job description	Wed, 10/26/05 8:58 AM	13KB
Kevin Brown	RE: Database Analyst	Tue, 10/25/05 1:41 PM	8KB
paulk@magna-systems.com	Re: REG: POSITION OPENING FOR ORACLE DBA IN PHILADELPHIA	Tue, 10/25/05 1:29 PM	24KB
Winter, Stephanie	RE: HI Peter! I have another Oracle DBA position for you	Tue, 10/25/05 1:25 PM	34KB
ambrish@cybercorp.com	RE: Inquiry about Dice Job Number DCORDBA	Tue, 10/25/05 9:04 AM	26KB
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Kevin Brown	Re: Database Analyst	Mon, 10/24/05 2:46 PM	4KB

Re: DBA position
 Peter Zhang <peterzhang9999@yahoo.com> View To: Timothy Matjasick <timatjasick@relevance.com>

Hi Tim,

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To	Subject	Sent	Size
Beth Ann Koch	Re: ORACLE DBA	Fri, 10/28/05 12:14 PM	4KB
MAC Kotha	Re: Sr Oracle DBA	Fri, 10/28/05 11:48 AM	33KB
Sam Matreja	Re: Database Administrator (DBA) - Senior - C. Jersey	Fri, 10/28/05 11:46 AM	10KB
apply@rangam.com	Re: CareerBuilder.com: Job Title: Database Administrator - Spec	Fri, 10/28/05 11:09 AM	9KB
Sam Matreja	Re: Database Administrator (DBA) - Senior - C. Jersey - 1 Yr Cor	Fri, 10/28/05 11:07 AM	7KB
vwah@infotechpa.com	RE: As per our telecom for Position in Harrisburg, PA - O	Fri, 10/28/05 10:40 AM	51KB
vwah@infotechpa.com	RE: As per our telecom for Position in Harrisburg, PA - O	Fri, 10/28/05 9:17 AM	121KB
James Oliver	Re: Fw: Fw: res	Fri, 10/28/05 9:03 AM	12KB
Dacar, Julie I	Re: references	Fri, 10/28/05 8:49 AM	12KB
Sam Matreja	Re: Database Administrator (DBA) - Senior - C. Jersey - 1 Yr Cor	Thu, 10/27/05 12:01 PM	95KB
Dacar, Julie I	RE: job description	Wed, 10/26/05 2:47 PM	43KB
Joe Goul	RE: Peter, would these Oracle Apps DBA Assignment in PA inter	Wed, 10/26/05 2:12 PM	43KB
Dacar, Julie I	RE: job description	Wed, 10/26/05 11:31 AM	29KB
Dacar, Julie I	RE: job description	Wed, 10/26/05 11:08 AM	23KB
santi	RE: Inquiry about Dice Job Number ORADBA - client name Farm	Wed, 10/26/05 9:04 AM	29KB
Timothy Matjask	Re: DBA position	Wed, 10/26/05 9:03 AM	12KB
Dacar, Julie I	Re: job description	Wed, 10/26/05 8:53 AM	13KB
Kevin Brown	RE: Database Analyst	Tue, 10/25/05 1:41 PM	8KB

Re: DBA position
 Peter Zhang <peterzhang9999@yahoo.com> View To: Timothy Matjask <tmajask@relevante.com>
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Hi Tim,

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To	Subject	Sent	Size
Timothy	Re: Oracle DBA position	Mon, 10/31/05 10:01 AM	3KB
Joe Trainor	Re: Fw: YOUR RESUME CANDIDAT POSITION	Mon, 10/31/05 8:04 AM	47KB
Perry Dev	RE: Inquiry about Dice Job Number b123	Mon, 10/31/05 8:02 AM	13KB
Beth Ann Koch	RE: ORACLE DBA	Mon, 10/31/05 7:59 AM	12KB
Sam Matreja	Re: Database Administrator (DBA) - Senior - C. Jersey	Fri, 10/28/05 12:45 PM	119KB
Perry Dev	RE: Inquiry about Dice Job Number b123	Fri, 10/28/05 12:36 PM	37KB
Beth Ann Koch	RE: ORACLE DBA	Fri, 10/28/05 12:14 PM	4KB
MAC Kotha	Re: Sr Oracle DBA	Fri, 10/28/05 11:48 AM	33KB
Sam Matreja	Re: Database Administrator (DBA) - Senior - C. Jersey	Fri, 10/28/05 11:46 AM	10KB
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vwah@infotechpa.com	RE: As per our telecom for Position in Harrisburg, PA - O	Fri, 10/28/05 10:40 AM	51KB
vwah@infotechpa.com	RE: As per our telecom for Position in Harrisburg, PA - O	Fri, 10/28/05 9:17 AM	121KB
James Oliver	Re: Fw: Fw: res	Fri, 10/28/05 9:03 AM	12KB
Dacar, Julie I	Re: references	Fri, 10/28/05 8:49 AM	12KB
Sam Matreja	Re: Database Administrator (DBA) - Senior - C. Jersey - 1 Yr Cor	Thu, 10/27/05 12:01 PM	95KB
Dacar, Julie I	RE: job description	Wed, 10/26/05 2:47 PM	36KB
Joe Goul	RE: Peter, would these Oracle Apps DBA Assignment in PA inter	Wed, 10/26/05 2:12 PM	43KB

Re: DBA position
 Peter Zhang <peterzhang9999@yahoo.com> View To: Timothy Matjask <tmajask@relevante.com>
 (read) (56KB)

Hi Tim,

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To	Subject	Sent	Size
Schmeiss, Richard	RE: Oracle DBA (hello again)	Thu, 11/3/05 10:17 AM	6KB
Schmeiss, Richard	Re: Oracle DBA (hello again)	Thu, 11/3/05 10:08 AM	4KB
Dacar, Julie	RE: fannie mae personal interview	Thu, 11/3/05 10:03 AM	24KB
Winter, Stephanie	RE: Hi Peter!	Thu, 11/3/05 9:55 AM	52KB
Winter, Stephanie	RE: Hi Peter!	Thu, 11/3/05 9:45 AM	46KB
William_Jeffert@fanniemae.com	Thanks	Thu, 11/3/05 9:41 AM	3KB
Rashmi Ball	Re: ORACLE DBA (DE)	Thu, 11/3/05 9:35 AM	18KB
John Clark	Re: Project in Rochester, NY...are you interested?	Thu, 11/3/05 9:17 AM	15KB
Dacar, Julie	RE: fannie mae personal interview	Tue, 11/1/05 12:55 PM	18KB
Dacar, Julie	Re: fannie mae personal interview	Tue, 11/1/05 12:14 PM	7KB
Winter, Stephanie	RE: Hi Peter!	Tue, 11/1/05 11:45 AM	46KB
Winter, Stephanie	RE: Hi Peter!	Tue, 11/1/05 10:25 AM	40KB
Lisa	Re: Career Opportunity	Mon, 10/31/05 6:37 PM	8KB
Wayne	Re: Oracle DBA real time replication	Mon, 10/31/05 2:34 PM	3KB
Joe Trainor	Re: Fw: YOUR RESUME CANDIDATE POSITION	Mon, 10/31/05 10:01 AM	3KB
Perry Dev	RE: Inquiry about Dice Job Number b123	Mon, 10/31/05 8:04 AM	47KB
Beth Ann Koch	RE: ORACLE DBA	Mon, 10/31/05 8:02 AM	13KB
Sam Hlatrejs	Re: Database Administrator (DBA) - Senior - C. Jersey	Mon, 10/31/05 7:59 AM	12KB

Re: DBA position
Peter Zhang <peterzhang9999@yahoo.com> View To: Timothy Matjasick <timatjasick@relevant.com>
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Hi Tim,

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Jonny@jason.com	initia	Thu, 11/3/05 8:44 PM	2KB
Winter, Stephanie	RE: Hi Peter!	Thu, 11/3/05 6:28 PM	58KB
Johannsen, Jan (Telmark Gl)	Re: opportunity	Thu, 11/3/05 8:25 PM	3KB
Murali	Re: Need a Oracle DBA	Thu, 11/3/05 10:57 AM	94KB
Wayne	Re: Oracle DBA real time replication	Thu, 11/3/05 10:50 AM	5KB
arjun@diverselynx.com	Re: Please find the requirement details [Oracle DBA]	Thu, 11/3/05 10:44 AM	16KB
Schmeiss, Richard	RE: Oracle DBA (hello again)	Thu, 11/3/05 10:28 AM	9KB
Schmeiss, Richard	RE: Oracle DBA (hello again)	Thu, 11/3/05 10:17 AM	6KB
Schmeiss, Richard	Re: Oracle DBA (hello again)	Thu, 11/3/05 10:08 AM	4KB
Dacar, Julie	RE: fannie mae personal interview	Thu, 11/3/05 10:03 AM	24KB
Winter, Stephanie	RE: Hi Peter!	Thu, 11/3/05 9:55 AM	52KB
Winter, Stephanie	RE: Hi Peter!	Thu, 11/3/05 9:45 AM	46KB
William_Jeffert@fanniemae.com	Thanks	Thu, 11/3/05 9:41 AM	3KB
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Dacar, Julie	Re: fannie mae personal interview	Tue, 11/1/05 12:14 PM	7KB
Winter, Stephanie	RE: Hi Peter!	Tue, 11/1/05 11:45 AM	46KB
Winter, Stephanie	RE: Hi Peter!	Tue, 11/1/05 10:25 AM	40KB

Re: DBA position
Peter Zhang <peterzhang9999@yahoo.com> View To: Timothy Matjasick <timatjasick@relevant.com>
res15.doc (66KB)

Hi Tim,

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To	Subject	Sent	Size
nagaraj@kaiserntek.com	Dice ID: 10117326	Tue, 11/8/05 11:34 AM	91KB
Alex Kingsley	Re: Job Opportunity-Database Administrator-Open Position-Har	Tue, 11/8/05 11:28 AM	14KB
Kanchana Aiyar	Re: Oracle DBA	Mon, 11/7/05 5:23 PM	116KB
Dacar, Julie	Re: tomorrow's 10am interview	Mon, 11/7/05 3:38 PM	10KB
Sam Matreja	Re: Database Administrator (DBA) - Senior - C, Jersey - 1 Yr Cor	Mon, 11/7/05 2:27 PM	10KB
Winter, Stephanie	Re: Hi Peter!	Mon, 11/7/05 1:03 PM	70KB
Gonzales, Joseph	Re: Oracle 11i DBA Job Opportunity at TEKsystems in Austin, TX	Fri, 11/4/05 3:20 PM	118KB
Winter, Stephanie	Re: Hi Peter!	Fri, 11/4/05 9:51 AM	64KB
jerrykog@us.ibm.com	Thanks	Thu, 11/3/05 8:44 PM	3KB
Winter, Stephanie	Re: Hi Peter!	Thu, 11/3/05 6:28 PM	58KB
Johannsen, Jan (Telmark Gl)	Re: opportunity	Thu, 11/3/05 6:25 PM	3KB
Murali	Re: Need a Oracle DBA	Thu, 11/3/05 10:57 AM	94KB
Wayne	Re: Oracle DBA real time replication	Thu, 11/3/05 10:50 AM	5KB
arjun@diverselym.com	Re: Please find the requirement details [Oracle DBA]	Thu, 11/3/05 10:44	16KB
Schmeiss, Richard	RE: Oracle DBA (hello again)	Thu, 11/3/05 10:28	9KB
Schmeiss, Richard	RE: Oracle DBA (hello again)	Thu, 11/3/05 10:17 AM	6KB
Schmeiss, Richard	RE: Oracle DBA (hello again)	Thu, 11/3/05 10:08	4KB
Dacar, Julie	RE: forie mae personal interview	Thu, 11/3/05 10:03 AM	24KB

Re: DBA position
 Peter Zhang <peterzhang9999@yahoo.com> View To: Timothy Matjask <tmatjask@relevant.com>
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Hi Tim,

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To	Subject	Sent	Size
gabriele.vanaken@corp.co	new hire paperwork	Wed, 11/16/05 11:36 A	2KB
Winter, Stephanie	RE: Hi Peter!	Tue, 11/15/05 11:36 AM	215KB
Bolin, Pat	Re: CDI pre-employment documents	Tue, 11/15/05 10:49 AM	233KB
Sam Matreja	Re: Database Administrator (DBA) - Senior - C, Jersey - 1 Yr Cor	Wed, 11/9/05 6:54 PM	9KB
Petrella, Barbara	Re: Rescheduled Interview	Wed, 11/9/05 6:47 P	6KB
mpisefl@deloitte.com	Thanks	Wed, 11/9/05 6:38 P	3KB
Shendrick@deloitte.com	Thanks	Wed, 11/9/05 6:27 PM	3KB
Serego, Kristi	Re: Description	Tue, 11/8/05 6:29 PM	17KB
nagaraj@kaiserntek.com	Dice ID: 10117326	Tue, 11/8/05 11:34 AM	91KB
Alex Kingsley	Re: Job Opportunity-Database Administrator-Open Position-Har	Tue, 11/8/05 11:28 AM	14KB
Kanchana Aiyar	Re: Oracle DBA	Mon, 11/7/05 5:23 PM	116KB
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Sam Matreja	Re: Database Administrator (DBA) - Senior - C, Jersey - 1 Yr Cor	Mon, 11/7/05 2:27 PM	10KB
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Winter, Stephanie	Re: Hi Peter!	Fri, 11/4/05 9:51 AM	64KB
jerrykog@us.ibm.com	Thanks	Thu, 11/3/05 8:44 PM	3KB
Winter, Stephanie	Re: Hi Peter!	Thu, 11/3/05 6:28 PM	58KB

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